

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

BARBARA H. LEE, *et al.*,

Plaintiffs,

v.

VIRGINIA STATE BOARD OF ELECTIONS,
et al.,

Defendants.

Civil Action No. 3:15-CV-357

MOTION FOR RECONSIDERATION

COME NOW Plaintiffs the Democratic Party of Virginia, Barbara H. Lee, and Gonzalo Aida Brescia (collectively, “Plaintiffs”), by and through counsel, and move this Court pursuant to Federal Rule of Civil Procedure 59(e) to reconsider its Memorandum Opinion and Order (ECF. Nos. 110 - 111) granting in part and denying in part Defendants’ Motion to Dismiss Plaintiffs’ Amended Complaint. Specifically, Plaintiffs request reconsideration of this Court’s dismissal of Plaintiffs’ intentional discrimination claims in Counts IV and V of the Amended Complaint. Plaintiffs’ respectfully suggest that this Court’s dismissal of those counts on standing grounds constitutes clear legal error and failure to reconsider their dismissal will result in manifest injustice.

For the foregoing reasons, Plaintiffs ask that the Court reconsider its dismissal of Counts IV and V of Plaintiffs’ Amended Complaint and, upon reconsideration thereof, reinstate those claims. As required, this motion is supported by an accompanying memorandum in support thereof.

Respectfully submitted,

DATED: January 11, 2016

By: /s/ Amanda R. Callais

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CERTIFICATE OF SERVICE

On January 11, 2016, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing to the following:

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